

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
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SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Chapter 13 Standing Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE:
EUGENIA ROMERO

Case No.: 17-29950VFP

HEARING DATE: 12/07/2017

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. Section 1325(a)(4).
Specifically, there is non-exempt equity in debtor's real estate.
- Debtor has failed to provide proof of income.
Specifically,
need current & 4/1/17 pay stub from debtor's main job.
The debtor has failed to provide proof of current income. A paystub from debtor's employer dated no later than two weeks prior to the 341 date must be submitted.

The debtor has failed to provide proof of income for the six months preceding the filing of this case.
- The Trustee has reviewed last year's tax return and a substantial refund was received. The Trustee therefore requests that any refund above \$1,500.00 be turned over to the Trustee for the life of the plan.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied.

Dated: November 14, 2017

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee